

THE KAPLAN LAW OFFICE
30 WALL STREET, 8TH FLOOR
NEW YORK, NEW YORK 10005

SUSAN KAPLAN, PHD, ESQ.
TEL. 347-683-2505
skaplan@lawkaplan.com

CHARLES CARANICAS, ESQ.
TEL. 347-432-1463
caranicas@lawkaplan.com

July 16, 2019

VIA EMAIL

Honorable John J. McConnell, Jr.
United States District Court
One Exchange Terrace
Providence, RI 02903

Re: John Doe v. Brown University
17-cv-191 JJM-LDA

Dear Judge McConnell:

On behalf of Plaintiff, we are writing to request that the Court extend the Scheduling Order by 60 days to complete expert discovery. Plaintiff had to replace an expert due to a conflict. Plaintiff has effectively mitigated the issue and has retained a new expert, whose schedule prohibits full disclosures by July 29, 2019 as currently scheduled. We also request that the deadlines for expert depositions and dispositive motions also be extended by 60 days.

We have consulted with Steve Richard on behalf of Brown on Thursday, July 12, 2019, but they have yet to express a position on this request.

Plaintiff's counsel is available for a conference call at the Court's convenience, if requested.

Respectfully Submitted,

/s/ Susan Kaplan

cc: Steven M. Richard, Esq.
Sonja L. Deyoe, Esq.